POLREP NO: 13 (REMOVAL)

Date: 7/29/1995
Subject: TRI Container Site
From: John Martin, OSC, U.S. EPA, Region VI, ERB (214/665-6748)
To: Director, ERD
Charles A. Gazda, Chief, ERB, Region VI
State Contact : ODEQ

Site No: 7s
FPN No: N/A
Response Authority: CERCLA
NPL Status: NON-NPL SITE
State Notification: ODEQ
Incident Category:
Inactive Waste Mgmt Facility
Action Memorandum Status:
Action Memo approved 09/21/94
Ceiling Increase approved 07/18/95

CERCLIS No: OKD070040589
Delivery Order No: 0035-06-082
NRC No: 206781
Action Lead: Fund
Start Date: 9/29/94
Completion Date: Pending
Event Qualifier: TC

I. SITUATION INFORMATION

A. Site description

The TRI Container Site (formerly Tulsa Recon Co.) is the location of a former drum refurbishing and manufacturing facility that was abandoned about two years ago. The local post office uses the address of 17400 E. young St., Tulsa, Ok, 74116, for the onsite removal command post. TRI Container is located at latitude 36[4]

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(Sec. 26, T20N, R14E).

B. Description of threat

The site is located in an industrial area with some residences within a quarter mile. The site occupies approximately ten acres with fenced facility portion occupying five acres. The property contains a large warehouse building divided into a north and south bay, two sheds, and a large unlined wastewater pond. Waste streams included ten storage tanks with 44,000 gallons of waste oil, a large vat of sludge waste, nearly 2,000 drums with contents, and an estimated 10,000 empty drums.

C. Preliminary Assessment Results

On 11/08/94, at the request of state and local officials, the OSC tasked the TAT to visited the site to evaluate the situation. Their observations included; several drums labeled "corrosive" and "flammable", six storage tanks with oily contents, several openings in the fence, and evidence that the site was frequented by trespassers. The initial drum count estimated that there were approximately 8,000 drums abandoned

onsite with 10% of the drums having contents. A majority of the drums were stacked and could not be accessed.

Thirty samples from various areas of the site were taken for conducting the hazcatting procedures. The results were used to determine laboratory analytical parameters. Sixteen samples were sent for laboratory analysis. The lab analysis indicated that there were RCRA corrosive materials and flammable liquids stored together in a room of the south bay warehouse. Outside materials sampled showed only the vat liquid (pH 1.9) to be a RCRA characteristic waste.

D. Site History/Background

The site is a former drum refurbishing and manufacturing facility that was abandoned sometime in 1992. On 11/06/93, vandals entered the Tri Container site and released the contents of a 4,000 gallon tank. Local and state officials responded to the scene and utilized a local contractor to secure the release.

E. Historical actions taken:

The first phase of the removal action started on 11/28/94. Site crew members demobilized 05/08/94 to allow for TAT to conduct a extent of surface contamination survey and to request additional funding to complete the removal action originally proposed. Additional funding was necessary since the added number of actual drums found onsite increased disposal and labor costs. The following tasks completed this first mobilization phase of the removal action included:

- Sorted through nearly 12,000 drums to separate RCRA empty drums (10,000) from the drums with contents (2,000). Many of the drums with contents had to be overpacked because of the poor integrity of the abandoned drums.

- Staged the drums with contents so that each drum could be sampled for field hazardous characterization. After characterization, each drum was placed into its respective waste stream. Twenty-six waste streams were formed.

- Laboratory analysis of a representative sample from each waste stream was performed. The contents of partially full drums were consolidated to create full drums.

- Prepared profile sheets and began arrangements for the disposal of the 26 waste streams. Thus far, the hazardous waste streams transported offsite for disposal are; 147 drums of paint-liquid, 248 drums of paint-sludge, 158 drums of paint-solid, and 40 drums of acids.

- Crushed 7,860 RCRA-empty drums and transported them offsite for disposal in the local RCRA approved landfill.

II. SITE INFORMATION

A. Site Activities to Date

During the week beginning MON 07/24/95, EPA-OSC, TAT, and ERCS mobilized to the site to begin the second phase of the removal activities. During this reporting period, ERCS crew started to ship off liquid waste from storage tanks onsite utilizing vacuum truck. A total of 8,700 gallons of waste liquid was shipped off to an approved disposal facility. Also, a total of overpacked 53 55-gallon drums (2915 gallons) of waste paint related material, and 58 55-gallon drums (3500 gallons) of waste flammable, solids, n.o.s related material were shipped to offsite disposal facility. ERCS started excavating contaminated surface soils. TAT collected 5 confirmation soil samples from the excavated areas.

B. Next Steps:

Complete the offsite disposal of hazardous and non-hazardous waste groups.

C. Key Issues:

None.

III. PROPOSED ACTIONS

The following tasks comprise the remaining proposed actions to be taken at the site:

- Finalize the transportation and disposal of the remaining drums of hazardous and solid wastes. All RCRA empty drums will be scrapped for recycling or disposal.

- Finalize the transportation, treatment, and disposal of the waste oil found in the site's tanks. The empty tanks will be rendered inoperable and remain onsite.

- Finalize the transportation, treatment, and disposal of the sludge found in the acid vat. The sludge-contaminated surface soils found near the acid vat will be excavated for transportation and disposal.

- Excavate for transportation and disposal the surface soils contaminated with high levels of metals. The contaminated surface soils with lead concentrations above 1,000 ppm lead will be removed down to two feet. Since the site is an industrial facility with restricted access, only the gross surface contaminated areas will be removed.

IV. COST INFORMATION

07/30/95

	Amount Obligated	Cost to Date	Ceiling
ERCS	$1,248,000	$ 979,718	$1,310,000
TAT	$ 160,000	$ 133,263	$ 150,000
Contingency	$ 10,000	n/a	$ 150,000
TOTAL	$1,418,000	$1,112,981	$1,610,000

Percent of Extramural Project Funds Remaining: 69%

V. DISPOSITION OF WASTES/ENVIRONMENTAL INDICATOR SUMMARY

T&D not complete at this time; will include on final POLREP.

TAT PM: Rick Neely